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SUPREME COURT
STATE OF WASHINGTON
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SUPREME COURT OF THE STATE OF WASHINGTON

HBH; SAH; and TREY HAMRICK, litigation guardian ad litem on behalf of KEH, JBH, and KMH,
Respondents,
V.
STATE OF WASHINGTON,
Petitioner,
and
TOWN OF EATONVILLE,
Defendants.

No. 94529-2

STATEMENT OF ADDITIONAL AUTHORITY

COME NOW respondents HBH, SAH, and Trey Hamrick, litigation guardian ad litem on behalf of KEH, JBH, and KMH (collectively "Hamrick") and submit the following additional authority to the Court pursuant to RAP 10.8:

• C.L. v. Dep't of Soc. & Health Servs., __ Wn. App. __, __ P.3d __, 2017 WL 3587572 (2017) (State owed a common law duty of care to dependent foster children, placed for adoption with family that had a history of molesting children, who were then sexually abused for years).

DATED this 22 day of August, 2017.

Respectfully submitted,

Philip A. Talmadge, WSBA #6973 Sidney C. Tribe, WSBA #33160 Talmadge/Fitzpatrick/Tribe 2775 Harbor Avenue SW Third Floor, Suite C Seattle, WA 98126 (206) 574-6661

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Nelson C. Fraley II, WSBA #26742 Faubion, Reeder, Fraley & Cook, P.S. 5316 Orchard Street West University Place, WA 98467 (253) 581-0660

Attorneys for Respondents HBH, SAH, and Trey Hamrick, litigation guardian ad litem on behalf of KEH, JBH, and KMH

DECLARATION OF SERVICE

On said day below, I electronically served a true and accurate copy of the *Statement of Additional Authority* in Supreme Court Cause No. 94529-2 to the following parties:

Lincoln C. Beauregard Julie A. Kays Connelly Law Offices 2301 North 30th Street Tacoma, WA 98403 Nelson C. Fraley II Faubion, Reeder, Fraley & Cook, P.S. 5316 Orchard Street West University Place, WA 98467

Peter J. Helmberger Assistant Attorney General Office of the Attorney General P.O. Box 2317 Tacoma, WA 98402 Gregory G. Silvey Assistant Attorney General Office of the Attorney General P.O. Box 40126 Tumwater, WA 98501

Original e-filed with:
Washington Supreme Court
Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: August 22, 2017 at Seattle, Washington.

Matt J. Albers, Paralegal Talmadge/Fitzpatrick/Tribe

TALMADGE/FITZPATRICK/TRIBE

August 22, 2017 - 1:52 PM

Transmittal Information

Filed with Court: Supreme Court

Appellate Court Case Number: 94529-2

Appellate Court Case Title: HBH; SAH; and Trey Hamrick v. State of Washington, et al.

Superior Court Case Number: 11-2-15110-2

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Comments:

Respondents' Statement of Additional Authority

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